

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION**

<b>JOHN KINLAW,</b>	)	
	)	
	)	Civil Action No.:
	)	3:17-cv-00772-REP
Plaintiff,	)	
	)	
v.	)	
	)	
<b>DR. CHARLES NWAOKOCHA, et al.,</b>	)	
	)	
Defendants.	)	

**PLAINTIFF'S PROPOSED JURY INSTRUCTIONS**  
**AND PROPOSED VERDICT FORM**

Pursuant to the Court's Rule 16(B) Scheduling Order and Local Rule 51, Plaintiff John Kinlaw hereby offers the following proposed jury instructions (Exhibit A) and proposed verdict form (Exhibit B).

Respectfully submitted, this 5<sup>th</sup> day of July 2019.

/s/ MARIO B. WILLIAMS  
Mario B. Williams (VSB #91955)

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**CERTIFICATE OF SERVICE**

I hereby certify that I have served a true and correct copy of the foregoing  
PLAINTIFF’S PROPOSED JURY INSTRUCTIONS AND PROPOSED VERDICT FORM with  
the Clerk of Court using the CM/ECF system which will automatically send email notification of  
such filing to all counsel of record.

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Respectfully submitted, this 5<sup>th</sup> day of July 2019.

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